

# NABOB

National Association of  
Black Owned Broadcasters

May 31, 2019

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: Notice of *Ex Parte* Communication - 2018 Quadrennial Review  
MB Docket No. 18-349**

Dear Ms. Dortch:

On May 30, 2019, the undersigned President of the National Association of Black Owned Broadcasters, Inc. ("NABOB") met with Commissioner Geoffrey Starks and Acting Legal Advisor for Media and Consumer Protection Michael Scurato. In that meeting, the undersigned presented the following comments on behalf of NABOB:

Radio Subcap Rule: I stated that NABOB supports the Commission's current Subcap rule. I explained that significant relaxation or elimination of the rule to allow ownership of eight or ten FM stations in a market would be detrimental to the entire AM radio industry and would have a particularly detrimental impact on African American and other minority station owners and prospective owners. I explained that, if the larger companies are allowed to own eight or ten FM stations in the largest markets, those companies will abandon AM radio to increase their ownership of more FM stations. This would result in decreased investment in AM radio and would undermine the Commission's AM revitalization efforts. A flight of capital from AM radio would devalue all AM radio stations and could result in the loss of the financial underpinnings of current AM station owners. This could result in some AM stations going dark with a resulting loss of service to the public that relies on those stations.

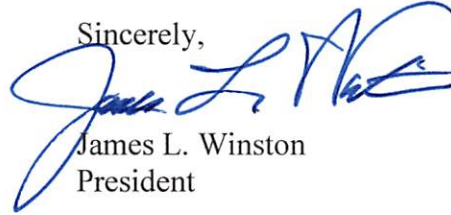
I also explained that allowing unlimited ownership of AM stations in a market is not a good approach to helping increase investment in AM radio, because it has the potential to substantially undermine diversity of ownership in the AM service. The AM service, because of the generally lower cost of ownership, is the primary entry point for new radio entrepreneurs. Allowing one owner to own all of the AM stations in a market could close the door for potential new entrants. Moreover, just like allowing increased consolidation of local market FM ownership, allowing

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consolidation of AM ownership would create an unreasonable competitive situation for single station AM owners in a market. NABOB's position is that the current Subcaps rule, which limits the total number of stations that one entity is allowed to own in all markets, should not be amended or relaxed.

In accordance with Section 1.1206(b) the Commission's rules, this notice is being filed in the Commission's Electronic Comment Filing System.

Sincerely,

A handwritten signature in blue ink, appearing to read "James L. Winston", is written over the printed name and title.

James L. Winston  
President

cc: Commissioner Geoffrey Starks  
Michael Scurato